

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

A.J. & Q.C.,

Plaintiffs,

v.

MASP, LLC,

Defendant.

CIVIL ACTION FILE

NO. 1:23-cv-4247-JPB

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

This Court should grant Plaintiffs' Motion for Summary Judgment under Rule 56 of the Federal Rules of Civil Procedure because no genuine issue of material fact exists. Specifically, there is no evidence to rebut Plaintiffs' evidence that Defendant knowingly benefitted from participation in a venture that it knew or should have known violated the TVPRA as to Plaintiffs A.J. and Q.C.

For these reasons, and the reasons outlined in Plaintiffs' Brief in Support of Plaintiffs' Motion for Summary Judgment, this Court should grant Plaintiffs' Motion for Summary Judgment.

Respectfully submitted this 11th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

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## CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

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## CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Respectfully submitted this 11th day of October, 2024.

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